

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA

CASE NO: 1:18-CR-000109

Plaintiff,

JUDGE COLE

vs.

AKHLIDDIN KALONOV

**MOTION TO MODIFY PROBATION
RESTRICTIONS**

Defendant.

Now comes the Defendant, **AKHLIDDIN KALONOV**, through his attorneys **L. PATRICK MULLIGAN AND ASSOCIATES**, and hereby moves this Court for an Order modifying the conditions/restrictions of probation in order to permit Mr. Kalonov to continue his current employment and travel out of state.

A Memorandum in Support is attached.

Respectfully Submitted,

/S/ L. Patrick Mulligan

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MEMORANDUM IN SUPPORT

MAY IT PLEASE THE COURT:

As this Court is keenly aware, Mr. Kalonov recently obtained his CDL driver's license and obtained full time employment as an over the road truck driver with Felix Transport, Inc. In that job he drives an eighteen wheeler with a flat-bed trailer and delivers steel coils as well as heavy equipment including some military items such as armored vehicles and tanks.

On November 2, 2022, Mr. Kalonov appeared before this Court for sentencing and was granted probation. Because he resides approximately an hour west of Philadelphia, this Court ordered that probation be transferred to his home state of Pennsylvania. Upon meeting with his probation officer, he was informed that he is not permitted to leave the state of Pennsylvania while on probation. Undersigned counsel respectfully requests an order which eliminates that restriction and specifically allows Mr. Kalonov to maintain his current employment.

Respectfully Submitted,

/S/ L. Patrick Mulligan

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Certificate of Service

I hereby certify that a copy of the foregoing was delivered to the U.S. Attorney's office on the same day as filing via electronic filing.

/S/ L. Patrick Mulligan
L. PATRICK MULLIGAN
Attorney for Defendant